

YOUR TRAVEL PAYMENT COMPANY.

AirPlus

INTERNATIONAL



Privacy Statement

AirPlus Account

A. Privacy Statement: AirPlus Account

According to the principles of fair and transparent data processing, it is essential to inform the person whose data is being processed about the processing itself and the purposes thereof.

Therefore, AirPlus would like to provide you with all the information required to ensure fair and transparent data processing in light of the circumstances and conditions under which AirPlus processes your personal data.

1. Product Description

Your employer (the "Subscriber") has entered into an agreement (the "Agreement") with AirPlus International Srl ("AirPlus"), Via della Salute 14/2, 40132 Bologna, Italy, regarding the use of the AirPlus Company Account and/or AirPlus Virtual Cards (collectively the "AirPlus Account").

The AirPlus Company Account is a central settlement account for the payment of business-related travel expenses. The AirPlus Company Account is used for suppliers that accept UATP credit card payments and can be used to book and pay for travel requirements, including hotel, car rental, rail etc.. The AirPlus Virtual Cards can be used for both business-related travel expenses and for procurement from all suppliers that accept MasterCard credit cards.

AirPlus will provide the Subscriber with all the company's expenses through a collective statement displaying additional information relating to each transaction (for example your staff ID, cost center, etc.) which is required for the Subscriber's travel expense management, procurement and/or accounting.

2. Data Controller

AirPlus is responsible for the personal data collected and processed during the use of the AirPlus Account. This includes additional data about you (for example staff ID, cost center, etc.). Such data may be provided to AirPlus by Travel Service Providers (including Travel

Agencies, Car Rental Agencies, etc.) as well as by the Subscriber.

3. Data Processing Description

In order for AirPlus to provide its products, AirPlus will need to collect and process your personal data.

During the use of the AirPlus Account, AirPlus collects and processes personal data necessary to enable transactions, to facilitate the management of business travel related expenses and to be able to create a structured statement for the Subscriber. This data includes technical information on the transaction itself, information on the merchant where the AirPlus Account was used, any information the merchant provides (such as the purchased goods or services) as well as additional information provided by the Subscriber (such as a staff ID or cost center). In this Privacy Statement such personal data shall be referred to separately and collectively as "Account Data".

Account Data will not be used for direct marketing purposes.

4. Legal Basis for the Data Processing

AirPlus processes your Account Data only in accordance with applicable law, especially the EU General Data Protection Regulation ("GDPR"):

- Account Data is processed pursuant to Art. 6 1 (f) GDPR (legitimate interests); AirPlus and the Subscriber have a legitimate interest in processing Account Data in order to expedite and facilitate travel expense management as well as procurement.
- Data transfers to public authorities, when legally required, are conducted pursuant to Art. 6 1 (c) GDPR (compliance with a legal obligation).

5. Data Transfers to Data Processors and Third Parties

AirPlus will forward your Account Data only to fulfil the respective business purpose, if mandated by law, or to service providers which have been contracted by AirPlus and are obligated to comply with applicable data protection regulations.

5.1. Data Processors

AirPlus provides access to or shares your Account Data with carefully selected service providers. These service providers only handle your Account Data on behalf of AirPlus as so-called data processors, acting only on instructions given by AirPlus. Therefore they are prohibited from using your Account Data for their own business purposes.

AirPlus shares your Account Data under strict confidentiality obligations with the following categories of service providers:

- IT service provider (hosting and infrastructure services), located in Europe
- Transaction-related service providers (receipt processing services), located in Europe
- Customer relationship service providers (call center services), located in Europe

5.2. Third Parties

AirPlus may also disclose your Account Data to trusted third parties who assist us in providing the AirPlus Account, as long as those parties agree to keep your Account Data confidential and comply with applicable data protection regulations.

AirPlus transfers your Account Data to the Subscriber. AirPlus does so when delivering the statement on the transactions initiated through the AirPlus Account. The purpose for this transfer is to structure relevant travel management and procurement processes. The Subscriber may receive Account Data in a digital format that enables the Subscriber to further process Account Data on their own IT systems.

In addition to that AirPlus may disclose your Account Data to the following categories of third parties:

- To external auditors in the event of audits or investigations, if there is a legal requirement or legitimate business interest to do so;
- To insurance companies in case you and/or the Subscriber wish to take advantage of the insurance cover available in connection with the AirPlus Account;
- To external lawyers in the context of legal claims or to courts acting in their judicial capacity;
- As required by law AirPlus may share personal data with public authorities (e.g. Banca d'Italia and other responsible national Authorities).

5.3. Corporate Discount Agreements

If and when the Subscriber has entered into a corporate discount agreement with airlines or into other agreements with brokers between travel agencies and airlines, AirPlus may transmit Account Data to the Subscriber's contracting partners. AirPlus may also transmit aggregated Account Data to facilitate contract and discount negotiations.

6. Data Transfers to Third Countries

Personal Data will be transferred to countries outside the European Union or the European Economic Area ("third countries") only to the extent required for the respective purpose (e.g. enabling transactions or reports to Subscribers) or mandated by law (e.g. reporting duties stipulated by tax laws). Prior to any transfer of Account Data to processors or third parties in third countries, AirPlus ensures that a transfer mechanism pursuant to GDPR is in place (e.g. the Model Clauses for the transfer of personal data to third countries provided by the European Commission). In order to receive a copy of the safeguards in place please use the contact details provided at the end of this Privacy Statement in the "Contact AirPlus" section.

7. Sources of Personal Data and Categories of Personal Data

AirPlus does not collect all Account Data from you directly but receives your Account Data from third parties (in particular the Subscriber and Travel Service Providers).

- The Subscriber may provide AirPlus with the following categories of data: The Subscriber's name and address, your name, your staff ID and cost center, and/or other additional information to facilitate travel expense management and/or procurement such as an internal process number.
- Travel Service Providers may provide AirPlus with the following categories of data: The Subscriber's name and address, your name, your employee number and cost center, and/or other additional information such as airline ticket numbers or car rental details to facilitate the Subscriber's travel expense management.

8. Data Retention

AirPlus processes and saves personal data only to the extent required to fulfill the purpose for which it was collected. Data will be deleted once the purpose has been fulfilled, unless AirPlus has a legal obligation to retain that data (e.g. for trade or tax law requirements).

AirPlus will erase your personal data as soon as it is no longer needed for the aforementioned purposes. Personal data may also be saved for the period of time in which claims can be asserted against AirPlus.

In addition personal data will be saved to the extent to which and for those periods of time for which AirPlus is legally required to do so. Our obligations regarding proof and retention are stipulated by local laws, including but not limited to the Italian Commercial Code, Tax Code and Anti-Money Laundering regulation. According to these laws, retention periods can be up to ten years.

9. Rights of the Data Subject

You as the data subject may assert the following statutory rights towards AirPlus: the right to obtain information pursuant to Art. 15 of

the GDPR, the right to rectification pursuant to Art. 16 of the GDPR, the right to erasure pursuant to Art. 17 of the GDPR, the right to restriction of processing pursuant to Art. 18 of the GDPR, the right to object pursuant to Art. 21 of the GDPR (please refer to section "Information on your Rights to object" for further information), the right to data portability pursuant to Art. 20 of the GDPR and the right to lodge a complaint with a supervisory authority pursuant to Art. 77 of the GDPR. You can appeal in particular to the Supervisory Authority which is competent for your place of residence or your state or to the Supervisory Authority which is competent for AirPlus.

This is:

Garante per la protezione dei dati personali
Piazza Venezia n. 11 - 00187 Rome
Tel.: (+39) 06.696771
Fax: (+39) 06.69677.3785
Mail: protocollo@gpdp.it
Certified mail: protocollo@pec.gpdp.it

If you would like to exercise your rights as a data subject, please contact AirPlus at:

AirPlus International Srl
Data Protection Officer
Via Della Salute 14/2
40132 Bologna (BO), Italia
protezionedati@airplus.com

10. Contact AirPlus

If you have any questions concerning the handling of your personal data, you can contact the AirPlus Data Protection Officer at any time at:

AirPlus International Srl
Data Protection Officer
Via Della Salute 14/2
40132 Bologna (BO), Italia
protezionedati@airplus.com

B. Information on your Right to Object

Right to object to Processing based on Legitimate Interest

You are entitled to object to the processing of your personal data that is based on Art. 6 1 (f) of the GDPR (processing necessary for the purposes of fulfilling legitimate interests), on grounds relating to your particular situation.

Exercising your Objections

Your objection need not follow a particular form. Please direct it at:

AirPlus International Srl
Data Protection Officer
Via Della Salute 14/2
40132 Bologna (BO), Italia
protezionedati@airplus.com